



Response to Scoping Comments Proposed Revisions to Recreation WAC 332-52

I. Scoping Process and Overview

On September 30, 2004, the Washington Department of Natural Resources (DNR) issued a Scoping Notice on the possible revision of Chapter 332-52 WAC (Managed Lands and Roads – Use Of) regarding recreation and public access. The department held a series of eight statewide public meetings to obtain comments on the possible revision of Chapter 332-52 WAC regarding recreation and public access on DNR-managed lands and for preparation of an Environmental Impact Statement (EIS). The comment period closed on November 15, 2004.

The scoping process invites and involves the public, agencies, tribes and stakeholders in commenting on a range of categories to be analyzed through the EIS process. It helps narrow the focus of the EIS to significant environmental issues, and to eliminate insignificant impacts or issues not directly related to the proposal.

DNR sent letters of invitation to all Indian tribes in Washington State, offering to meet on a government-to-government basis and to gather their comments. Several tribes agreed to meet with DNR representatives. Those comments, as well as comments from staff and other interested stakeholders, were considered in developing this response to scoping comments.

In scoping, DNR requested comments on the following defined categories:

General Rules across public lands apply to the use of fire, firearms and alcohol on public lands. This category promotes peace and quiet, while instructing the public not to destroy or remove public resources, litter or to solicit while visiting these lands.

Road Use describes general rules governing vehicle use on DNR-managed roads such as passing, vehicular right of way and following another vehicle. The use of recreation vehicles on roads is also described in this category.

Developed Recreational Facilities addresses any DNR-built site, trail or structure on public land for recreational purposes, including but not limited to trails, trailheads, campgrounds, picnic areas, water recreation areas and ski huts. Specific rules for campgrounds and water recreation areas are outlined in this category.

Organized Events addresses any event sponsored by an individual, recognized club(s) or organization(s) that generally involves 30 or more participants and/or is advertised to the general public in advance with a predetermined time and place. General rules for organized events are included within this category.

Dispersed Recreation includes recreation that occurs on DNR-managed lands but that is outside the boundaries of developed recreation facilities and trails. Specific examples include hunting and fishing, recreational target shooting and recreational harvest of shellfish and forest products for personal use.

Directing Access includes such topics as closures, designating roads and trails open and closed, and compliance with signage and self-registration.

Designated Trails are those trails that are maintained, managed or have been approved by DNR for recreational use.

Undesignated Trails are those trails on DNR-managed lands that are not built or managed by the department, and that have not been approved by DNR.

Volunteer Activities refers to the use of volunteers, volunteer registration and requirements to become a DNR volunteer, such as a background check for volunteers working with juveniles and requiring volunteers to coordinate with DNR staff before embarking on a project.

II. Need and Purpose of Proposal

Public access and recreation are a component of DNR's management of state trust lands. RCW 79.10.120 directs DNR to provide for multiple uses of the trust lands it manages – including recreation areas and trails, education and scientific studies, special events, hunting and fishing, and maintenance of scenic areas and historic sites – when such uses are compatible with trust land management. In addition, RCW 79.90.455 directs DNR to strive to provide for a balance of benefits, which includes encouraging public use and access to aquatic lands. RCW 43.12.065 (in accordance with RCW 34.05) gives DNR authority to adopt and enforce rules that pertain to the promotion of public safety and the protection of public property on DNR-managed lands.

Chapter 332-52 WAC was originally written in 1970 and is considerably outdated. Since that time, there have been a number of technological advances in recreational vehicles, such as off-road vehicles, mountain bicycles and four-wheel drive vehicles.

Other recreational uses on DNR-managed lands include hunting, fishing, horseback riding, mountain biking, scenic driving, hiking, picnicking, berry picking and mushroom gathering. DNR is faced with how best to manage the varying types of recreational use and users as the number of recreation enthusiasts continues to grow. It is estimated that more than 11 million visitors a year access DNR-managed lands for recreational purposes.

It is DNR's intention in revising Chapter 332-52 WAC to provide a safer, more enjoyable experience for the public as they access and recreate on DNR-managed lands, as well as to protect natural resources through more effective management of public access and recreation.

III. Response to Comments Received

A. Planning Process

Public Participation

The general public, as well as local and state officials, must be included in these broad, long-term issues, to best guarantee active and open participation.

Response: DNR is convening an advisory group consisting of recreation users and local and state government officials to ensure consistency and compatibility across land management/ownership. In addition, public meetings will be held when the Draft EIS is published and released.

Develop Fair, Flexible Rules

Rules for recreation and public access should be flexible enough to allow for fairness and enforcement on specific parcels of land that have been designated for particular uses.

Response: Revised rules are intended to provide consistency while allowing flexibility and broad applicability across the landscape.

Regional management allowed the ability to make all decisions possible

Local regional management should be afforded the ability to make all decisions possible within their regions, provided that they are consistent with the approved plans of DNR.

Response: Rules are designed to guide behavior of people recreating on DNR-managed lands. Most recreation-related decisions will be made at the management plan level within each region.

B. Definition

Clearly define what is meant by trails vs. roads. Make it simple and clear – what’s a road, what’s a trail?

Response: Roads and trails will be defined in the Draft EIS, along with rules that pertain to each designation. However, some trail systems within the state are a combination of both roads and trails or in some cases, entirely roads. Multiple designations provide for flexibility in management options, as long as trust management activities are not impaired or limited.

C. Scope and Applicability

MULTIPLE USE

Continue varied use of all DNR-managed lands for recreation activities such as hunting, fishing, perhaps target shooting under controlled conditions, and harvest of shellfish and forest products for personal use. State owned lands should be available for all these many uses and include hiking, biking and other activities as well.

Response: The multiple use statute (RCW 79.68) establishes public recreational use as acceptable as long as it is compatible with basic activities that fulfill the financial obligations of trust management, is consistent with other management guidelines, and is compatible with ecological goals. In addition, RCW 79.90.455 directs DNR to strive to provide for a balance of benefits, which includes encouraging public use and access to aquatic lands.

AMERICANS with DISABILITIES

- Keep current road and trail access open as it promotes access for all levels of people. When lands are closed, you close out people based on their age, health, and handicaps that may prevent people from enjoying the wilderness.
- All roads should be kept open to accommodate handicapped sightseers. This land is public and should be kept open and accessible to all the public.

Response: DNR manages state lands in trust to generate funds for specific beneficiaries, with the exception of natural areas and aquatic lands. Under the current WACs, DNR-managed lands are open unless posted closed to protect resources or public safety. However, the designation of closed vs. open will be further analyzed in the Draft EIS.

DNR, along with other state agencies, meets the Americans with Disabilities Act (ADA) requirements on all new facilities construction. DNR, in cooperation with many state and federal agencies, publishes the “Accessible Outdoor Recreation Guide” which lists accessible recreational sites across the state. The guide is available on-line at

<http://www.parks.wa.gov/ada-rec/>

- Decrease size of water bars on roads for ADA handicapped accessible use on ATVs.
- Consider ADA access when decommissioning roads.

Response: These issues will be analyzed in the Draft EIS.

D. General Rules across Public Lands

ENGINE NOISE

DNR should not locate ORV trails in close proximity to homes. The noise is an important factor to consider, especially because noise carries and magnifies all traffic sounds. The deafening reverberations of ORVs would totally destroy the peaceful atmosphere of a rural setting.

Response: DNR has the authority to enforce any ordinances that relate to DNR-managed land, including local noise ordinances. Engine noise from motorized vehicles will be analyzed in the Draft EIS. Specific concerns regarding a particular area or neighborhood will not be addressed in the Draft EIS; concerns regarding specific neighborhoods and trail use are managed by regional recreation staff and overseen by the Region Manager. Engine noise can also be addressed in recreation management plans.

POLLUTION

Concern regarding the pollution emitted from motorcycles and other off-road vehicles.

Response: Pollutants associated with the use and maintenance of motorcycles and other off-road vehicles (e.g., changing oil, adding fuel) will be analyzed in the Draft EIS.

PEACE AND QUIET

Set limitations on noise by time of day.

Response: Limiting the use of any audible device, including operating electrical generating equipment, will be analyzed in the Draft EIS. Existing WAC 332-52-030 (3a) prohibits the use of audible devices in such a manner and at such times so as to unreasonably disturb other people. DNR will consult other agency’s rules (such as State Parks’ WAC 352-32-

056(3) governing quiet hours) when developing draft language. This will also be analyzed in the Draft EIS.

ALCOHOL USE

Concern is that DNR develop rules to curb drinking and driving on public lands. Also, alcohol use on public lands should apply to people on horses or bicycles (anyone moving).

Response: The existing WAC prohibits driving motorized vehicles while intoxicated. In general, rules regarding the consumption of alcohol will be analyzed in the Draft EIS.

DUMPING/VANDALISM

Concern that dumping and vandalism is increasingly a problem. More people on DNR-managed lands results in more dumping and vandalism. Request for DNR to establish rules for control and cleanup of illegal dumping.

Response: The existing WAC prohibits illegal dumping and vandalism. The Draft EIS will analyze the existing rules to ensure they best address the type of vandalism and illegal dumping occurring on public lands today.

ANIMALS/ PETS

Allow dogs and horses on all trails.

Response: Dogs, horses and other animals currently are allowed on state trust lands. Existing WAC 332-52-040 (12) prohibits bringing pets and other animals into campgrounds unless under physical restrictive control at all times. However, they are not allowed in natural areas. The Draft EIS will analyze rules regarding pets across all state trust lands, including taking a closer look at other agency's rules, such as State Parks. It's likely that designations allowing pets will vary depending on landscape, number and types of recreation users, and environmental concerns (i.e., impacts to wildlife).

E. Road Use

GENERAL ROAD USE (2-wheel and all-wheel drive passenger vehicles and 4-wheel drive passenger vehicles)

This section pertains to rules regarding passenger vehicles on designated roads while protecting public resources and promoting public safety.

TRAFFIC SAFETY

- The public gains access to DNR recreation areas via forest, county, state, and/or private roads. Traffic safety is a concern to the public and to DNR.
- All traffic impacts in the neighborhoods and region must be addressed-- this includes highways, secondary roads and parking.
- Traffic access is narrow, somewhat hazardous at the intersection with Highway 101. Hardly conducive to safe usage by greatly increased numbers of users for a recreational.
- Highway 101 has become quite heavily traveled and should a number of ORVs seek to turn off the highway onto a narrow two-lane road, traffic would likely become snarled.
- Increased traffic on residential and local roads.

Response: The existing WAC addresses vehicles as they enter and exit a developed recreation facility. Traffic safety will be analyzed in the Draft EIS, including traffic impacts on residential neighborhoods abutting DNR-managed lands, as well as engineering standards when vehicles enter state land from a major road, such as Highway 101.

LICENSE/ REQUIREMENTS EQUIPMENT

Street Legal

- Washington State laws should apply to DNR trails and roads – riders should have valid driver's license and equipment should be street legal.
- Forest roads closed to street vehicles should remain open to off-road vehicles.
- ORV vehicles need to be maintained in accordance with Washington state vehicle laws; street legal – due to the safety factor and environmental consideration.

Response: DNR requires off-road vehicles to have a permit or legal licenses. Street legal requires that the vehicle have tabs and legal license. DNR does not currently require trail vehicles to be street legal. However, this issue will be analyzed in the Draft EIS.

PARKING

- Parking areas should be available to users in areas where foot traffic and ATV use is required.
- Parking should be available for those public lands that are accessible only for foot and ATV traffic.
- There is inadequate parking at trailheads. Need directed parking for horse trailers.
- Provide adequate parking like pull through for horse trailers, R.V.s. Need adequate space and design (peoples' rigs are getting bigger!).

Response: Parking issues, as they relate to safety, traffic flow, and resource damage will be analyzed in the Draft EIS.

PULL-OFFS

- In certain areas within the forest there is no place to pull off the road and park. There need to be areas sufficient for cars to pull off the road every mile or so. One idea might be to make crossroad areas a little wider to make parking possible. In some areas, there are small pull-offs that appear to allow vehicles to pass each other. Obvious areas where one can't park!
- Existing rules concerning parking along forest roads should continue as is (parking allowed as long as access is not blocked).

Response: Parking facilities will be analyzed in the Draft EIS.

F. Recreational Rules by Type of Use

OVERVIEW

Establish Recreational Use Criteria

Establish, to the extent possible, detailed criteria for all the uses under consideration. This is a difficult and time-consuming matter, but absolutely essential. Without written criteria, every decision you make in the future will end up being unique, and therefore far more time-consuming and conflict-ridden than it has to be. For example, if you establish a criterion

that all recreation involving motorized vehicles must be X miles from hiking trails, or Y miles from current or likely residential areas, and that these ORV "roads" must have a suitably large staging/parking area situated on or very near a major highway, then many of the objections to such usage may well disappear, while still allowing that form of recreation.

Response: The intent of proposed revisions to existing WAC 332-52 is to develop guidance that is general enough to be applicable statewide, yet allow for local forest management objectives and community processes.

NON-MOTORIZED

More non- motorized recreation

- Please ensure new WACs will accommodate and encourage non-motorized recreation on all DNR lands regardless of land management designation and encourage and allow new trails (formal and informal) on all lands where appropriate.
- More access for bicycle/horse/hiking trails and maps. It would be nice to see more trail access for horse/bicycle/hiking low impact use.

Response: Rules are designed to guide behavior of people recreating on DNR-managed lands. Most recreation-related decisions will be made at the management plan level within each region.

Foot Traffic

- All roads and access into and within publicly held lands must be available for use, at a minimum for foot traffic access. Said access must be identifiable and plainly marked for users. Parking should be available for those public lands that are accessible only for foot and ATV traffic.
- The INWC strongly recommends that all roads that are currently available and safe to use be available to the appropriate users and user groups unless restricted by logging activities or closed for safety or high fire danger reasons. This would include access by foot traffic, should prevailing safety reasons demand. There should be no reason access by foot traffic be eliminated except for wildfire or high fire danger periods – a situation unlikely during fall hunting season.

Response: Rules are designed to guide behavior of people recreating on DNR-managed lands. Most access and recreation-related decisions will be made at the management plan level within each region.

MOTORIZED

More primitive and dispersed access for motorized recreation

- Want primitive and dispersed access for motorized vehicles.

Response: Dispersed designation will be analyzed in the Draft EIS. Decisions about the quantity and location of opportunities are site specific and are part of the management planning process.

More motorized recreation should be allowed on state lands and roads.

- Need more motorized access – need access to DNR land. Ex. If not paved, it's accessible; helps clarify, simply, where recreational users can go, regardless of land ownership (more and more people on motorized vehicles using limited areas).

- Need more places available for novice motorized vehicle users.
- More motorized recreation should be allowed on state lands and roads. I also believe that multiple use should be retained wherever possible. All people should have access to our lands with a minimum of laws and regulations to try and decipher just so one can go and enjoy the outdoors.
- We need more motorized trails. I know many people who would be willing to help build and maintain them to help offset the rising costs.

Response: Dispersed designation will be analyzed in the Draft EIS. Decisions about the quantity and location of opportunities are site specific and are part of the management planning process.

Safety and Liability associated with motorized recreation

- We are avid hikers and mountain bikers and feel it is unsafe to share the trails with motorized vehicles.
- Be especially careful with motorized recreation. For many reasons, it is the most destructive, causes the most problems, and has the highest injury rate and potential liability.

Response: DNR does everything in its power to promote public safety, including working with user groups and volunteers. Trail use designations are site specific and decided as part of the management planning process. However, rules governing motorized vehicles in relation to non-motorized recreational uses will be analyzed in the Draft EIS.

Motorized use increases fire danger

Increased fire danger because of the close proximity of our homes to the forest area where motorized vehicles are used.

Response: This will be analyzed in the Draft EIS. Every motor vehicle must be equipped with a spark-arresting muffler when traveling over any state lands (RCW 76.04.252).

OFF-ROAD MOTORIZED VEHICLES

- Off-road motorized vehicles should be allowed to use forest roads during daylight hours.
- Establish designated areas for ORV use (ex. Tahuya).

Response: DNR does everything in its power to promote public safety, including working with the user groups and volunteers. Trail use designations are site specific and are decided as part of the management planning process. However, rules governing motorized vehicles and hours to govern peace and quiet, as well as safety, will be analyzed in the Draft EIS.

ALL-TERRIAN VEHICLES (ATV)

- I believe that as a taxpayer and a resident of Washington State that I should be allowed to snowmobile and use an ATV on state controlled lands.
- I feel strongly that ATVs should be used on designated roads and trails and cross-country travel should be restricted.
- Need designated areas for wheeled (also ATV) vehicles on snow when appropriate.
- A lot of areas that are currently open only to equestrians and mountain bikers could be used by ATV's.
- Allow more legal 4x4 use.
- Create rules for ATV use on roads.

- Want more ATV access to gravel roads.
- ORV tagged vehicles should be allowed on DNR land.

Response: DNR does everything in its power to promote public safety, including working with the user groups and volunteers. Trail use designations are site specific and are decided as part of the management planning process. However, rules governing motorized vehicles, including rules of the road and dispersed use, will be analyzed in the Draft EIS.

Identify clearly roads that are decommissioned/abandoned – these abandoned roads may be safer than regular trails, esp. for novices, ATVs.

Response: Road abandonment falls under the jurisdiction of Forest Practices rules. State trust lands have to meet Forest Practices rules for road abandonment. Currently, there is no process in place to change the designation of a road on state trust lands to a trail. Development of such a process is beyond the scope of this project.

SNOWMOBILING

- I believe that as a taxpayer and a resident of Washington State that I should be allowed to snowmobile and use an ATV on state controlled lands.
- Snowparks on DNR land are important for winter recreation access points. Plowing and toilets are all paid for by the State Parks Winter Recreation programs at no cost to DNR. Please continue this public recreation.
- The forest needs to be open to snowmobile use unless posted closed. We do not need to have just roads and trails open to snowmobile travel with a few open areas for off-road adventures. This creates areas of concentrated use and creates more problems than it will ever solve.
- Keep all roads on DNR open for snowmobiling where previously allowed.
- Snowmobiles should be allowed to go “cross country” from one road or area to another.
- Wheeled vehicles should not be allowed on specific groomed snowmobile trails.
- Snowmobiles should only need to stay on roads if posted, otherwise, they should be able to go cross-country.
- Snowmobile use should be tied to standards of snow coverage and conditions.
- Lands and roads should be open unless posted closed for snowmobiles.

Response: DNR does everything in its power to promote public safety. Trail use designations are site specific and are decided as part of the management planning process. However, rules governing snowmobiles and designated trails will be analyzed in the Draft EIS.

G. Developed Recreation Facilities

ALL DEVELOPED RECREATION FACILITIES/GENERAL RULES: CAPACITY

- Define site capacities, limits at facilities.
- Limit number of users in one area at the same time.
- Have a standard on numbers of parking stalls for large vehicles, trailers, etc.
- Need larger recreation system now that we have more users.
- Require restroom facilities tied to usage threshold at trailheads and parking areas.
- Trailheads need to accommodate number of users, need toilets too.

- Consider a limitation on number of people taken out by kayak commercial companies; it's a carrying capacity issue.
- Need enough space for riders, horses, etc.

Response: Issues related to capacity will be analyzed in the Draft EIS.

Trail Specification

- Trails must be designed and built for a specific motorized user type and closed to all larger types, i.e., no quad use should be allowed on trails built to a single track specification, no 4x4 use allowed unless the trail is built for such use. The state should adopt the trail building specifications currently in use by the U.S. Forest Service and not develop new specifications.

Response: Issues related to trail specifications are generally made at the management planning level and are site-specific. Currently, DNR models trail specifications after those used by the U.S. Forest Service. Also, DNR is convening an advisory group, consisting of recreation users and various government entities responsible for recreation, to review and offer guidance on draft language and alternatives.

TRAILS: UNDESIGNATED

Undesignated Trails

Who is going to patrol these ORV trails and ensure that no one makes their own "road"?

Response: Enforcement and user built trails will be analyzed in the Draft EIS and will also be addressed at the local regional level under recreation management plans.

Rules to prohibit user-built trails

- Need rules that prohibit user-built trails. Penalize people who create their own trails on skid trails, old logging roads, etc., or illegally ride on trails officially open only to hikers, horse riders and bicyclists.
- Although this is more of a financial resources issue, I wish there were more DNR "rangers" out in the field who could write tickets to people who violate trail rules.
- Establish rules on user-built trails.
- Supply signage for user-built trails.
- Create process for building new user-built trails.
- Protect user-built trails during timber harvests.

Response: Issues related to user-built trails will be analyzed in the Draft EIS and will be addressed at the site specifically as part of recreation management plans.

CAMPGROUNDS

Concern that there are not enough campsites to handle current and future use.

Response: Issues related to capacity will be analyzed in the Draft EIS.

Horse camps

- Concern that horse camps should be restricted only if they are full or have a planned event. Otherwise, allow other users.
- Concern horse camps be restricted to stock use.
- Request the need for potable water in campgrounds, especially for horses.

Response: Horse camps will be analyzed in the Draft EIS; use and limitations are site specific and will be set as part of the management planning process.

Reservations

Want to be able to reserve campgrounds (i.e., for horseback events, competitive trail rides).

Response: Issues related to reservations will be analyzed in the Draft EIS and will be addressed in local recreation in site specific management plans.

Length of stay

Enforce length of stay in campgrounds; need more enforcement regarding people “living” in campgrounds.

Response: Issues related to length of stay will be analyzed in the Draft EIS.

H. Organized Events

DON'T ALLOW ORGANIZED EVENTS

- An additional reason to de-emphasize organized events in the larger blocks is the impact on wildlife. These activities primarily occur during the months in which most species are raising their young. The mass presence and resulting noise can seriously impact their efforts. There is no such thing as “non-consumptive use.”
- No organized events in undeveloped areas – private sector more appropriate.

Response: Organized events will be defined and analyzed in the Draft EIS. At this time, the number and location of organized events is a region-level decision.

FEES FOR EVENTS

- Need to distinguish between organized for-profit events (i.e., car rallies) and those organized as non-profit events (i.e., community service, Toys for Tots, etc.) and the cost requirements to those who hold such events. Should organization volunteer labor/hours spent on DNR lands be considered as credit and/or given consideration towards permit requirements?
- For-profit events: Should a percentage of profit made or a set percentage of profit be considered, with the revenue directed to Trust land account?
- Some provision should exist for recreational outfitting for river rafting, backcountry packing and camping as well as other commercial use within the forests under less burdensome financial structure. This may include organized events such as poker runs, rides or small ventures, which produce small amounts of revenue.
- Restitution to DNR for costs associated with DNR enforcement actions – mandatory – ordered by the court.

Response: Issues related to fees for events and for compensation for impacts to local facilities and trail systems will be analyzed in the Draft EIS.

RULES FOR EVENTS

- We encourage DNR to designate open areas for use by Trials Motorcycles and Rock Crawler 4x4s for activities such as observed trials and rock crawling competitions. These activities use comparatively little space per user and, if located sensibly, have low impact on the trust lands.
- Standard event permit applications and a permit process should be developed and used for all groups holding recreational events on trust lands. Permits should be made specifically for recreational events. Requirements for liability insurance, etc. should be uniform for all user groups. The process similar to that outlined in WAC 332-52-055 is acceptable.
- I recommend that the rules for organized events be made uniform across the state, and not just for Capitol Forest.
- Designate “group” sites.
- Standardize organized event rules statewide.
- Delegate authority to permit organized events to local government, with management responsibilities for a section of trail (i.e., Olympic Discovery Trail in Clallam County).
- Have fire equipment available for organized events.
- Make sure there is adequate parking for organized events – do not issue permits if parking is not adequate.
- Need to address organized events on all DNR land.
- Size of groups allowed should reflect sensitivity of the environment.
- Design specific permits for recreational organized events.
- In the event of a scheduling conflict who takes precedence?
- Establish a reservation system for organized events.

Response: Issues related to making rules for events on uplands and aquatic lands more uniform statewide will be analyzed in the Draft EIS.

EVENTS AND VOLUNTEER OPPORTUNITIES

- Organized events could be used to inspire local people to volunteer, for people to come together for a common goal, to promote use of trails for various recreational activities, to promote the story of a "working forest" (i.e., logging and recreation), and to educate people about how to protect the wilderness.
- Recognized user groups performing volunteer maintenance should be given priority in cases of scheduling conflicts.
- Organized events – how are they related to work party/volunteer events.

Response: DNR appreciates the volunteers and the many hours they provide. In general, DNR does not give preferential treatment. However, some regions require volunteer hours and give preference to recognized groups performing volunteer maintenance. Statewide consistency will be analyzed in the Draft EIS.

COMMERCIAL OUTFITTERS

- Some provision should exist for recreational outfitting for river rafting, backcountry packing and camping as well as other commercial use within the forests under less burdensome

financial structure. This may include organized events such as poker runs, rides or small ventures, which produce small amounts of revenue.

- Such things as recreational prospecting, rock hounding, or collecting of minerals and non-threatened or endangered plant species should be addressed in your plans. The goal should be continuation of current non-commercial enterprise level. Commercial or large-scale mining should have the same current regulation.
- Commercial outfitters should have permits and regulations.
- Liability of outfitters (i.e., kayak outfitters) – what role does liability play when groups are taken to DNR sites.

Response: Issues related to commercial outfitters will be analyzed in the Draft EIS as part of the analysis done on organized events.

I. Dispersed Recreation

GENERAL RULES

- I recommend that the introduction to this section include examples, including non-motorized recreation in areas which do not have a formal/"developed" trail system.
- Hunting, hiking, target shooting and other dispersed activities should be allowed as they currently are unless there is an overriding public safety issue in a specific area. Whereas the Okanogan has significantly less intense use and user conflict the least restrictions possible should be applied to all types of recreational pursuits.
- Dispersed recreation should be the main type of recreation allowed on large blocks of DNR land. The reason is that growing populations quickly diminish the land available for this within easy access (less than an hour) of major populated areas.

Response: Issues related to environmental impacts related to dispersed recreation will be identified and analyzed in the Draft EIS.

DISPERSED CAMPING

- Camping should be allowed at non-designated locations wherever possible. This works on federal lands and would provide more dispersed user impacts.
- Allow and make facilities available for camping at trailheads, including appropriate sanitation facilities. Allow dispersed camping throughout all state managed lands.
- Allow dispersed camping throughout all state managed lands.
- Establish rules about camping outside designated campgrounds.
- Specifically allow dispersed camping.
- Need consistency on when and where you can camp (i.e., hunting camps outside established sites, along streams, in gravel pits).
- Prefer dispersed camping not just confined to established sites – cuts down on bothering others.
- Need rules for use of fire in dispersed camping.

Response: Issues related to dispersed camping will be analyzed in the Draft EIS.

RECREATIONAL TARGET SHOOTING

- Allow access for hunters and shooters, as they allow a safe environment for the enjoyment of our sport.

- Recreational target shooting should be continued.
- Concern with the amount of rules and expressed that no more rules regarding shooting on DNR- managed lands.
- Concern that DNR be granted the authority to regulate shooting.
- Concern that there should be no discharge of firearms allowed.
- Concern that the sounds of gunfire are too close to neighborhoods; fearful that someone could get hurt or worse.

Response: Directing where recreational target shooting happens will be analyzed in the Draft EIS.

- Concern that some common-sense safety rules for target shooting rules be developed to promote safe hunting, target shooting, plinking opportunities – it respects the multiple use doctrine.
- Concern that unsafe shooting is being done on public lands. "Plinkers" commonly set bottles and cans on top of stumps or on small branches and shoot at them with only sky or forest for a backdrop. These rules may include:
 - Prohibition against shooting in the general direction of buildings, or vehicles, private properties, toward or across roads or mapped trails.
 - Hunters/shooters are responsible for knowing the area in which and toward which they are shooting.
 - Target shooting/"plinking" should only be done into an ample earthen backdrop.
 - Location and construction of a well-managed target shooting site/s would go a HUGE way towards solving the problems with out of control shooting behavior and littering.
 - Limit caliber of gun that can be used.
 - Recreational shooting should be safe and not make a mess. Use buffer zones and firearm restricted areas. Use signage for areas close to houses, trails, etc.
 - Need clearly designated target shooting areas with safety backstops; use sand, not gravel pit.
 - Problem with debris left behind by target shooters – manage similar to other illegal dumping.
 - No shooting from or across marked, known, established and non-motorized trails, including archery.
 - Warning signs should be posted in areas where people shoot guns often, to not shoot into the open areas of the forests and to be sure to shoot into an area that will stop a bullet.

Response: Issues related to recreational target shooting, including directing where it happens, will be analyzed in the Draft EIS.

Dispersed recreation areas open

- In the dispersed recreation areas category, all areas currently open to the shooting sports should be retained in that status. Statistics do not indicate the present situation has resulted in a hazard to the public.
- Publicly-owned lands should remain available for recreation activities such as hunting and the use of firearms.

Response: Dispersed recreation target shooting will be analyzed in the Draft EIS.

Strategies developed such as:

Designated areas for target shooting

- Have designated areas for target shooting – restrict other firearm use to hunting season.
- DNR should be required to provide shooting zones within recreation areas that are reasonably accessible for each populated area in the state.
- Shooting on public lands in general should be restricted to hunting season only and target practice allowed only on land dedicated to (leased for?) that purpose.
- Restrict use of firearms to more remote forest areas.
- Providing off-road use areas and shooting areas would probably help greatly so that roads like the Pilchuck River Road could be re-opened to the general public.
- Allow shooting ranges on DNR lands.
- Shooting needs to be addressed and should be prohibited in areas where any other type of public recreation is allowed.
- Use of firearms should be allowed in designated areas only.
- Some consideration might be given to the construction of basic, self-administered shooting ranges on appropriate sites within DNR managed lands.

Response: Issues related to designated recreation target shooting and shooting ranges on public lands will be analyzed in the Draft EIS.

Educate shooters to reduce unsafe shooting

I've also seen far too much dangerous target shooting on DNR lands. I own guns and like to shoot them. But on more than one occasion I've heard bullets fly over my head while grouse hunting. Almost always, unsafe target shooters were firing "assault rifles". I'd like to see DNR do something to educate target shooters on safe firearm use.

Response: DNR's enforcement officers enforce existing laws regarding unsafe shooting practices. The Washington Department of Fish and Wildlife offers hunter safety education, and organizations such as the National Rifle Association offer target shooting classes. Target shooting and promoting public safety will be addressed in the revised rules related to recreation and public use.

RECREATIONAL HARVESTING

Harvesting rock and mineral for personal use

Concern regarding needing rules governing the collection of rock and minerals (samples).

Specific rules regarding rock hounding may include:

- Make accommodations for rock hounding at specific sites (re: Walker Valley, etc.).
- Maintain road access for rock hunting and other activities.
- Designate areas for rock hunting.
- Limit quantity of rocks that can be removed (i.e., pounds like Bureau of Land Management's rules).
- Hand tools only allowed for rock hunting, such as picks, shovels, spades, chisels, hammers, etc.
- Use portable potties for all body wastes.

- All waste materials to be removed from area (carry in, carry out).
- All sites must be returned to their natural condition.
- State rock pits have been a source of mineral specimens for years. Just walking the trails have given us a chance to find agates and other interesting rocks. We ask that you consider rock collecting as dispersed recreation.
- Collectors should be responsible for trash found. Remove trash at mineral sites at designated dry camp areas at designated rock collection sites.
- Use only managed roads to reach rock/mineral sites. Park off of the maintained road to permit passage.
- Designate areas from which rock and mineral samples may be removed. Possession limit not to exceed a reasonable amount, about 5 gallons a day.
- Permit camping near sites, following general public land rules.

Response: Recreational rock and mineral hunting for personal use will be analyzed in the Draft EIS.

Fire wood for personal use

DNR should create rules for woodcutting for personal use.

Response: Rules regarding cutting firewood for personal use will be analyzed in the Draft EIS.

COMMERCIAL VS. RECREATIONAL HARVESTING

Concern that such things as recreational prospecting, rock hounding or collecting of minerals and non-threatened or endangered plant species be addressed in your plan. The goal should be continuation of non-commercial enterprise level should be maintained. Commercial or large-scale mining should have the same current regulation. The request is that DNR define the differences between “recreational” harvesting and “commercial” harvesting.

Response: This will be analyzed in the Draft EIS.

GOLD PANNING

Concern by recreational gold panning prospectors that they have been discriminated against in this state because they are lumped in with the more destructive gold dredging prospectors who have the potential of doing considerable harm to the stream environment. Request that DNR allow recreational gold panning.

Response: Recreational gold panning will be defined and analyzed in the Draft EIS.

J. Directing Access

ACROSS PRIVATE LAND

The increased posting of private land and exclusion from State lands

- Roads that access DNR managed lands are often blocked where they cross private lands, for example, the west access road to Loomis State Forest. DNR has allowed a private landowner to block the road and post it "No Trespassing."
- Please keep as many state lands open for hunting, fishing and sports access as possible. The increased posting of private land and exclusion from state lands (i.e., Vashon Island) reduces the opportunity for true sports.

- What are the requirements of a permit holder when leasing state land? Can state lands be closed to public access because of leases/permits issued?

Response: The leaseholder has no right to arbitrarily deny public access to leased state lands. However, conditions can exist which require public access restrictions to DNR-managed lands, such as the lessee's operations involving hazardous activities that could pose a risk of liability, or where public access would impede lessee operations and negatively affect trust revenues. Prior to restricting access, there must be a specific written agreement between the lessee and DNR that clearly defines the restrictions and the justifications for them.

Ever-increasing number of locked gates on DNR managed lands

My chief concern has to do with the ever-increasing number of locked gates one encounters on DNR managed lands, which attempt to restrict access to all but a few "key holders." These gates attempt to establish large areas of untouched, private hunting reserves exclusively for the benefit of grazing rights' leaseholders, their friends and families.

Response: See response above. Flexibility at the local management level is necessary to restrict access as needed.

Public lands are accessed through Weyerhaeuser logging roads which are closed

In the past three years, Weyerhaeuser has closed some of their lands to public recreation, opening only on a limited basis. These closures affect access to DNR lands. These public lands are accessed through Weyerhaeuser logging roads, consequently when Weyerhaeuser closes their lands, the DNR lands are closed, too. We encourage continued use of DNR lands for outdoor activities, but DNR needs a plan to allow access to these lands when Weyerhaeuser closes their lands.

Response: There are limited instances that allow private gates to restrict access to DNR-managed lands. It is necessary at times for DNR to negotiate agreement with private landowners for access across their land to an isolated parcel of state land in order to facilitate agency business. In those cases, it is entirely the landowner's decision as to whether public access is granted; there is no requirement that private landowners provide the public access to state land.

There are typically four access scenarios:

- 1) If a public county road is adjacent to state property, public access is available to that property.
- 2) If an access road crosses private land, access may be limited to DNR only, for management purposes, to reach DNR-managed lands through the private lands; this is set by contract with the private landowner.
- 3) If the private landowner has granted road access to both DNR (for management) and to the public, the road is open to all; this is also set by contract with the landowner.
- 4) If the private landowner does not grant access across private property to DNR or to the public, then neither can cross that property to reach DNR—managed lands.

Private gates

These private gates are increasing at an incredible rate. The rights of the leaseholders granted by their lease should definitely not restrict in any way, law-abiding citizens from using (in a lawful manner), that same DNR managed leased area for recreational opportunities.

Response: See response above.

Easement through private lands that prevents access to DNR-managed lands

Many of the lands managed by DNR are within private land holdings and essentially unavailable or inaccessible to recreation users. Easements through all private lands that prevent access to DNR-managed lands should be obtained and maintained to provide access to recreational users of public lands, even if they're only foot trails.

Response: See response above.

MORE ACCESS

- The INWC supports every effort to make publicly owned lands available for use within the safety restraints necessary on a given tract of land.
- Keep access roads available for fire suppression efforts
- Need vehicular access to all state lands (even if gated)
- Need access (around gates) to gated areas for senior citizens for ATV use.
- Need access around gates for all citizens in gated areas.
- I recommend the rules specifically remind the public that access may be denied or restricted to safeguard the environment, trust responsibilities and community interests.
- There is too little public land available to Off Highway Vehicle use. The Off Road Vehicle community is just too big, and pays too much in taxes, recreation fees and costs for equipment to be overlooked when decisions of future land use are on the table. We need to be considered, and given greater access to our own public lands.
- I support access and motorized recreation on DNR lands and would like to see more opportunities.
- Want more access for bicycle/horse/hiking trails and maps.
- It would be nice to see more trail access for horse/bicycle/hiking low impact use.
- Would like to recommend that access to the Natural Area Preserve and NRCAs be allowed by all non-motorized and non-wheeled motor vehicles.
- Road closures due to RMAPs should be kept open to motorized and non-motorized access of the ORV class as well as hikers and horsemen, unless serious resource damage or other legitimate reason would mandate closure in the interest of public safety.
- The state lands should not be closed to recreational uses due to any threatened or endangered species unless specific scientific proof exists to show that human interaction is limiting recovery in a historical use area, for example, denning sites could be protected during birthing seasons for species but open during other times.
- All roads that are currently available and safe to use should be available to the appropriate users and user groups unless restricted by logging activities or closed for safety or high fire danger reasons. This would include access by foot traffic, should prevailing safety reasons demand. There should be no reason access by foot traffic be eliminated except for wildfire or high fire danger periods – a situation unlikely during fall hunting season. Roads that are open for vehicle use should also be open for ATVs. Roads closed for standard vehicle use could be available for ATV use unless safety or wildlife needs demand limited or seasonal closures.

Response: Rules are designed to guide behavior of people recreating on DNR-managed lands. Many recreation-related decisions are site specific and are made as part of the management planning process.

MORE TRAILS

We would like to see forest roads that connect bike trails open to off road bikes making loop trail routes available or more trails made that connect already established trails so road riding won't be necessary. We would also like to see more variety in difficulty levels in trails and some communication channel opened to obtain rider information & opinion when building trails or improving trails so we can help the department make better choices on the construction of trails.

Response: Decisions regarding most larger forest blocks rely on input from citizen advisory groups. Rules are designed to guide behavior of people recreating on DNR-managed lands, to promote public safety and protect public resources. Many recreation-related decisions are site specific and are made as part of the management planning process.

Categorizing/Classifications of Recreation Areas

- There appears to be enough DNR land sites to satisfy each and every sport. I would suggest that more judicious planning be considered for each of them.
- No motorized activities in urban forests (i.e., DNR lands within 15 miles of a population center).
- After careful analysis, DNR should start a long, strategic process of categorizing all possible recreation areas and the uses which may be acceptable in given areas.
- If a particular segment of recreational users is shut out of a given area, it will certainly be far more acceptable to it if its members know that there are other areas that are available for such use. The goal is to accommodate all forms of recreation, but in places acceptable to the most people (knowing, of course, that you can never please everyone 100% of the time...).

Response: Revised recreation and public use rules will be written to allow DNR to designate areas for specific recreation opportunities.

LIMIT ACCESS

- Strictly limit the use of trail bikes and ORVs on state land.
- Maintain and increase the limits on access to public lands that will best protect these environmental resources. Each area in which increased access to DNR lands, by a variety of means, should take into account not only the various human interest groups who want that access, but also the bigger picture of how that use will impact the specific lands over time and in the ecosystem it represents.
- Off-road vehicle use needs to be severely restricted or policed. Part of the solution may be identification of one or more areas where people can run their various types of vehicles for off-road enjoyment that does not impact valuable wildlife and fish habitat.
- I would like to encourage DNR management rules to provide for recreation areas that do not allow motorized vehicles. I like to hike, kayak, and cross country ski and am very disturbed by snow mobiles, ATVs, motorized boats, and motor bikes. Recreation areas with motorized vehicles make the experience just like being in the city and that's not how public lands should be used.

- Usage that is destructive, such as ORV use, should not be encouraged. Do not use government funding for this purpose.

Response: Rules are designed to guide behavior of people recreating on DNR-managed lands, to promote public safety and protect public resources. Most recreation-related decisions will be made at the management plan level within each region.

SPECIFIC USES

- Our primary concern is that rock climbing be identified as a significant activity on DNR-managed lands (and therefore be included within your SEPA analysis).
- If at any time you make it so I can't ride my horse in the woods I will quit helping. Keep all horse trails open. Do not close any horse camps like two years ago.
- Please ensure new WACs will accommodate and encourage non-motorized recreation on all DNR lands regardless of land management designation and encourage and allow new trails (formal and informal) on all lands where appropriate.
- Designate specific sites for specific activities.
- Specific designations for where horses are allowed.
- Define areas appropriate for trails bikes.

Response: Rules are designed to guide behavior of people recreating on DNR-managed lands, to promote public safety and protect public resources. Most recreation-related decisions will be made at the management plan level within each region.

OPEN UNLESS POSTED CLOSED

- All roads should be kept open to accommodate handicapped sightseers. This public land is public and should be kept open and accessible to all the public. Nothing currently open should be closed. The public should be able to camp, hike, and rockhound anywhere on public land that is wilderness.
- I recommend that the rule for motorized travel on "roads, abandoned railway grades, skid roads, and similar routes inadequate for conventional 2-wheel drive automobiles" (para 4b of general rules) be modified to state that the routes are "open unless posted as closed by the department".
- Keep the land open to all users and promote shared use and trail education. Keep current road and trail access open as it promotes access for all levels of people. When lands are closed, you close out people based on their age, health, and handicaps which may prevent people from enjoying the wilderness. Not everyone is capable of accessing wilderness areas that require a long hike or bike ride to get there.
- I would like to see the rule of all roads closed to snowmobiles unless marked open changed to be all roads are open unless marked closed. I believe it would take less effort and manpower to mark (sign) the closed roads, and it would be easier for the recreationist to understand.
- We've always ridden on DNR lands and have used the snowparks and wish them to remain open for our use. Please keep the roads open and post closed only on the ones we can't use!
- My family rides snowmobiles, hunt, recreate on DNR land and pass through would like to see it open for all to enjoy and see the sights. You need to mark the roads that are open to use not closed or vise versa.

- Trails should be open unless marked closed.
- All roads should be open unless posted closed.

Response: The issue of DNR-managed lands being open unless posted closed will be addressed in revisions to WAC 332-52.

CLOSED UNLESS POSTED OPEN

- DNR should have a "Closed-Unless-Posted-Open" policy in order to take away the incentive to tear down signs and illegally ride on non-motorized trails. It is important to remember that such a policy would not close down any areas to motorized access. A "closed-unless-posted-open" policy would remove the incentive to vandalize close signs.
- Public lands, including DNR and WDFW lands, should be closed to all activities unless posted open. Approved activities should be actively, positively, and resolutely encouraged, far into the future.
- Have a signage system like "green dot" for open/closed roads and trails.
- Trails should be designated for each use but we oppose the "closed unless posted open" policy. Where this has been attempted, the anti-motorized users removed the "open" signs, effectively closing the trail.

Response: The issue of DNR-managed lands being closed unless posted open will be analyzed in the Draft EIS.

CLOSURES

- Road closures due to RMAP reasons should be kept open to motorized and non-motorized access of the ORV class as well as hikers and horsemen. The exception may be where serious resource damage or other documentable reason would mandate closure in the interest of public safety.
- Create an "appeals process" for road closures.
- Address seasonal closures, how they are determined. What are the criteria?
- Seasonal closures need to be driven by local manager's knowledge.
- Need provisions for expanding or moving trailheads, rather than just closed trailheads.

Response: Region managers make decisions regarding closures of trails and roads based on concerns for public safety and/or protecting public resources. Road abandonment falls under the jurisdiction of Forest Practices rules. State trust lands have to meet Forest Practices rules for road abandonment. Currently, there is no process in place to change the designation of a road on state trust lands to a trail. Development of such a process is beyond the scope of this project.

K. Volunteer Contributions

Volunteers

- Burnt Hill is used as a trash dumping spot and the only reason it's not worse is because of volunteers (such as myself) who make trips to the dumping spots and pick up after the slob.
- New construction and maintenance of non-motorized trails by volunteer groups should be encouraged to increase presence of responsible users on DNR lands.

- Many miles of existing trail in Washington State are currently maintained by the trail riders themselves. Riding clubs organize work parties to tackle projects that serve to minimize erosion, and assure lasting access to all users, be they on foot, hoof, or wheels.
- As a group of mountain bike riders/volunteers we see the value of giving back to the areas that we recreate in. By volunteering to do "work parties" we work in conjunction with the Forest Service and local land owners to fix, build, and maintain biking trails that we use. We have also done trash clean up projects to help protect and preserve the beauty of areas we love.
- If cost of maintaining these roads and trails is an issue, I suggest that you look toward other partners for help. For example, logging companies can help maintain and build roads as part of their agreement to log an area. Local trail users can help to maintain the trails and trailheads that they use. I suggest that DNR spend the time to develop these partnerships and look for ways to make it a mutually beneficial relationship for everyone involved.
- Volunteer efforts (past and present) have played a key role in keeping these trails open. To continue to keep trails open I suggest that DNR more actively try to partner with local volunteer groups and promote a more organized effort. Maybe even start an "adopt a trail" program as a way to get groups to commit to a long-term volunteer program.
- Include ways to multiply volunteerism.
- Create an adopt-a-trail program for user groups to help maintain areas.
- Develop qualifications, training, insurance for volunteers.
- Need certification for chainsaw operations and demonstrated ability clause.
- Reinstitute the Forest Watch Program – train volunteers.
- Citizen patrol, forest watch program is needed.
- Could a more active role on behalf of volunteers (including commercial outfitters) as stewards (maintaining sites) help keep sites open (e.g., Lummi site).
- Consider standards for what volunteers can and can't do (e.g., in campgrounds that have unsafe conditions).
- How will rules address volunteers, i.e., trail adoption, garbage pick-up, etc.?

Response: DNR's statewide volunteer program addresses volunteer qualifications, training and insurance requirements. Volunteer certification and training adhere to Washington Department of Labor and Industries standards and are implemented statewide. To promote public safety and protect public resource, volunteer activities must be done in coordination with DNR staff. It is against current rules for volunteers to build trails or structures without DNR's permission.

PARTNERSHIPS

- Coordinate with local jurisdictions and WSDOT on access permits and loading areas. Coordinate with local jurisdictions on permitted and/or special use land use activities for specific areas.
- To continue to keep trails open I suggest that DNR more actively try to partner with local volunteer groups and promote a more organized effort. Consider starting an "adopt a trail" program as a way to get groups to commit to a long-term volunteer program.
- Coordinated rules with other land management agencies.

- Coordinate rules with Forest Service rules.
- Reciprocity across states (ex. licenses and passes from other states, jurisdictions and agencies).
- Need ways to address diverse ownership in a forest block (e.g., county roads crossing through DNR) – construct trails along county roads so non-street legal vehicles don't break rules.

Response: DNR is convening an advisory group consisting of recreation users, local and state government officials to ensure consistency and compatibility across land management/ownership. In addition, public meetings will be held when the Draft EIS is published and released.

L. Enforcement

Comments

- Funding for extensive monitoring and policing of ORV users and accompanying impact activities are at best limited and uncertain.
- Strict quantitative rules for noise levels, proximity to housing and neighborhoods, etc. must be defined. Enforcement must be made clear and strictly defined as to how it will be done, what the fines will be for violation, how it is funded, and the frequency of patrol. Rules should not be written for self patrol or adopt a trail type enforcement only. Potential accidents, vandalism, refuse dumping, illegal uses of the sites, potential fires all must be given a probability review and consequences analysis.
- Drinking and driving on public lands needs to be curbed, first through education then enforcement.
- Enforcement: there is a definite need. There are too few officers for the vast areas that are under DNR jurisdiction. While most people are law abiding, there is always an element that are not.
- The worst problem in the local DNR managed forest (Yacolt Burn) is by far the dumping of trash, building materials, stolen cars, etc. The solution to that problem is not more rules, but more enforcement, because those abuses are already against the existing rules. What good does it do to fine tune the rules when the most basic violations are not enforced?
- One change I support is the permanent funding of an E & E officer instead of the one year at a time grant funding. Having an officer is crucial to the enforcement of appropriate use, trail head safety, and the general safety of the public recreating on public lands.
- More funding needs to be found in order to have better and/or more enforcement. Whether the DNR comes up with an annual pass, similar to the Forest Service and Park Service, using the money from citations, or some other means to relieve the financial burden created by illegal dumping, vandalism or theft, something really needs to happen.
- Education of the public in the proper etiquette when using public or private lands is also a must. Through our SKY Programs, being 'Light on the Land' is one of our primary issues.
- I've encountered far too many areas on DNR lands in which people on ATVs and dirt bikes have either created their own trails on skid trails, old logging roads, etc., or have

illegally rode on trails officially only open to hikers, horse riders and bicyclists. Although this is more of a financial resources issue, I wish there were more DNR "rangers" out in the field who could write tickets to people who violate trail rules.

- We need more rules and more law enforcement rangers out in the field to enforce those rules.
- Use positive enforcement rather than restrictive laws.
- Allow citations/penalties when wrong use in a designated area.

Response: The goal of the proposed recreation rule revisions is to provide clear, consistent and enforceable rules. Potential impacts to emergency services, such as law enforcement, will be analyzed in the Draft EIS.

M. Habitat/Environmental Protections

MUNICIPAL WATERSHEDS

DNR manages popular trailheads and camping facilities within the upper Sultan Basin, which is the water supply watershed for the Jackson Project. These DNR recreational facilities within the Jackson Project vicinity and watershed utilize DNR roads for access.

Comments:

- The licensees do not favor abandonment of roads currently providing access to the recreation sites in the upper Sultan Basin. The planned replacement of existing roads with hiking trails in the Sultan Basin, for example, will severely curtail and limit future use of these facilities, since they would no longer be available for day-hikes or persons with limited abilities. We believe that current upper Sultan Basin operations offer a reasonable balance between protection of a municipal water supply and opportunity for recreational use of the Sultan Basin, and we believe that any proposed regulations should maintain practices of this sort, without change.
- Proposed changes in public access rules that apply to the upper Sultan Basin need to consider potential impacts on the municipal water supply.

Response: The Draft EIS will consider potentially significant impacts to resources and to recreational opportunities and will discuss mitigation for these impacts if any new rules proposed in the Draft EIS would affect the municipal water supply and/or public access.

Environmentally Sensitive Areas

- It is not rocket science to isolate and enforce the more radical activities in areas that are not environmentally sensitive. Or to allow impact recreation in the areas that are more environmentally sensitive.
- Rules need to address damage to wetlands and erosion of environmentally sensitive areas.
- Rules need to address disturbance of habitat for sensitive wildlife.
- We are interested in seeing that significant areas of native vegetation are preserved as close to pristine condition as is practicable. The legislative mandate for DNR requires DNR to manage most of the lands under its authority to produce the highest sustainable income to support the state programs for which those lands are held. Preservation of special lands for their habitat value and providing public recreation are additional objectives for DNR in managing lands.
- So long as recreation is open to the public for free, there will be few lands set aside specifically for recreation by DNR because they do not satisfy the primary objective of

generating income. Indeed, if providing for recreation, for example leaving more trees as part of a timber sale for aesthetic values, reduces the revenue received, it is inconsistent with the guidelines for managing the land for generating revenue. Except in the case where introduction of non-native species is expected to interfere with the revenue generating potential for the land, spending money to control introduced species is also counter to the mandate of DNR.

- An example of an activity which would benefit from managing lands specifically for recreation (which is already done, but under free public access, on WDFW lands) could be managing the vegetation for game birds or deer instead of traditional agriculture (plowed ground, orchards and vineyards or grazing), in which case access would require a fee, comparable to the many privately owned lands which are already leased for hunting.
- People interested in native plants could pay to reduce the number of AMUs allowed on a parcel to reduce the impact of grazing by cattle or sheep on the vegetation in addition to simply outbidding the grazer for the lease. Bird watchers might be willing to pay to modify timber sales (e.g., harvesting fewer trees from a block or leaving more snags) to retain better wildlife habitat.
- A related issue is the potential for all users, but in the current context especially recreational users, of DNR lands to introduce non-native, especially weedy, species. The fear is that non-native species will degrade the value of the land in the future, even if they are not recognized as noxious weeds at this time. Toward that end we encourage DNR to establish policies and practices to minimize the introduction and spread of non-native species by recreational users.
- The first element would be a statement of purpose – for example, to preserve the natural values of the land to the maximum extent practicable and compatible with the other designated uses of the area. This would then be elaborated in practices that are to be followed, e.g., cleaning equipment and not allowing wheeled vehicles off of established roads and trails.
- References to current studies and representation by a wide spectrum of state and local environmental groups must be clearly visible and "independent" data published and or referenced that supports all SEPA checklist questions and or EIS documentation. All aspects of wildlife, forest management, and water issues must be addressed.
- Given that on many of these lands timber management is ongoing, and early successional habitat that is so necessary for many species of wildlife is more abundant than on many other public lands in the state, it is important that they be available for hunting and harvesting of game by licensed sports-people of Washington. Therefore, the INWC strongly recommends these publicly owned lands be and remain available for recreation activities such as hunting and the use of firearms.
- The INWC further proposes and supports increased focus on managing the DNR managed lands for wildlife habitat. Those timbered lands that are subject to harvest do release energy for early successional habitat, but generally as a consequence of harvest only. Management for wildlife habitat on DNR managed land should be a specific goal and not an afterthought or happenstance. The INWC strongly supports management plans for the improvement of wildlife habitat on all DNR managed lands.

Response: Potentially significant impacts to the environment, including impacts to wildlife, will be analyzed in the Draft EIS.

N. Land Management

Aesthetic values

If providing for recreation, for example leaving more trees as part of a timber sale for aesthetic values, reduces the revenue received, it is inconsistent with the guidelines for managing the land for generating revenue. Except in the case where introduction of non-native species is expected to interfere with the revenue generating potential for the land, spending money to control introduced species is also counter to the mandate of DNR.

Response: Potentially significant impacts to aesthetic values will be analyzed in the Draft EIS.

“One size fits all” management

- The department must reject the likely pressure from anti-access forces to create specific “one size fits all” management prescriptions through this rule-making. It is inappropriate and unworkable to dictate on-the-ground management details through a statewide OHV management rule.
- We request that an EIS be required prior to permanent or seasonal (non-emergency) closures of trails or campsites and any daily use limits. Managers must not be allowed to close or limit the use of these assets without disclosing specific scientific reasons. We strongly oppose any “planning via emergency order.” Some land and public managers improperly avoid the public planning process by instituting a patchwork of “temporary, emergency” closures that continue indefinitely. Any significant change in travel must be made via a lawful and public planning process. The agency’s “emergency” closure authority must be better defined and limited.
- The methods for site selection needs to be thoroughly addressed and made extremely clear to the reader. This should include rules for assuring compatibility with the local and regional neighbors and environment and projected demographics. For example, a site might be physically suitable for motorized vehicles but the community in which it is located may not want motorized use. Just because it is possible to have 4x4 use at a site if the local community does not support that use or the community lifestyle is inconsistent then the local preference must prevail.
- The economics of any recreational site proposal must be evaluated-- is it cost effective to implement and administer, does it have any payback, how much will it take from the real purpose of the DNR lands to generate state income, what risks are involved.
- The size of the site needs to be addressed and rules defined as far as the limits on multi-use. Smaller sites would not be compatible with both environmentally friendly activities such as hiking, bird watching, animal watching, snow shoeing, mountain bicycles, or camping versus the aggressive recreation uses such as motorcycles, 4x4 use, hunting, etc. Strict limits or prohibitions must be addressed and selection criteria clearly articulated.
- Growth patterns for the region must be addressed.
- Determination on site use, projected future site use and basis of projections need to be made-- number of estimated hikers, campers, bird watches, snow shoes, number of vehicle trips, peak volume.
- Rules should be implemented on how decisions are made to locate recreation sites, how surveys are done to determine what type is desired in the area, and how focus groups are comprised and function.

- Implement the recreational land use agreements requested by Clallam County for the Olympic Discovery Trail construction and use them as a template for future recreational use requests.
- After careful analysis, DNR should start a long, strategic process of categorizing all possible recreation areas, and the uses that may be acceptable in given areas. Recreation is an important economic driver that must be taken advantage of, especially in the often hard-pressed, rural areas close to DNR land.
- Block up land for recreation purposes.
- Take into consideration other ownerships, adjacent agencies, public utilities, etc.
- Consider impacts to recreation by all types of management activities.

Response: Revised rules related to recreation on DNR-managed lands will be as general as possible and will be clear, consistent and enforceable statewide.

WILDLIFE

- An additional reason to de-emphasize organized events in the larger blocks is the impact on wildlife. These activities primarily occur during the months in which most species are raising their young. The mass presence and resulting noise can seriously impact their efforts. There is no such thing as “non-consumptive use.”
- The state lands should not be closed to recreational uses due to any threatened or endangered species unless specific scientific proof exists to show that human interaction is limiting recovery in a historical use area. i.e. Denning sites could be protected during birthing seasons for species but open during other times.
- The SEPA and environmental rules need to be clarified and expanded to assure current evaluations of wildlife and plants are made by reputable organizations. References to current studies and representation by a wide spectrum of state and local environmental groups must be clearly visible and "independent" data published and or referenced that supports all SEPA checklist questions and or EIS documentation. All aspects of wildlife, forest management, and water issues must be addressed.
- There are definitely habitat (and wildlife viewing access and harvest) issues on lands managed by DNR.
- Where you find litter and booze abuse you usually also see destruction of riparian areas and driving through fish-bearing streams.
- Driving "quads", dirt bikes, and 4x4's through fish-bearing streams occurs in many areas throughout the Snohomish River basin. Part of the solution may be identification of one or more areas where people can run their various types of vehicles for off-road enjoyment that does not impact valuable wildlife and fish habitat.
- The INWC strongly supports management plans for the improvement of wildlife habitat on all DNR managed lands.

Response: Potentially significant impacts to wildlife will be analyzed in the Draft EIS.

O. Multiple Use

Recreational Conflicts

Comments:

- Recreation needs to be separated. Mountain bikes and horses, dirt bikes and hikers, shooters and ATVs don't mix. The Discovery Trail is an example of a lot of work that is undesirable to a lot of users because of recreational conflicts. It is more expensive and more difficult to manage, but if you want to open your trust lands to recreation, make it worthwhile.
- The size of the site needs to be addressed and rules defined as far as the limits on multi use. Smaller sites would not be compatible with both environmentally friendly activities such as hiking, bird watching, animal watching, snow shoeing, mountain bicycles, or camping versus the aggressive recreation uses such as motorcycles, 4x4 use, hunting, etc. Strict limits or prohibitions must be addressed and selection criteria clearly articulated.
- Allow multiple use while reducing conflict.
- Have purpose statement for rule revision that allows all uses while reducing conflict.
- Look for ways to not restrict activities.
- Should have equal use for everyone (less titles and specific use).
- In adjacent populated areas, need mixed use trails (such as near neighbors, need to accommodate all types of uses).
- Need to address multiple use on roads.
- Need rules for proper etiquette on multiple use trails.
- Multiple Use Act – allowances unless a) interferes with trust responsibility, b) damage to resources, c) in best interest...what about conflict with neighbors interests?
- Motorized use should be higher statewide.
- Allow user groups to maintain and build motorized use trails.
- How will rules address co-existence of diverse uses?

Response: The multiple use statute (RCW 79.68) establishes public recreational uses as an acceptable use as long as it is compatible with basic activities that fulfill the financial obligations of trust management. Rules are designed to guide behavior of people recreating on DNR-managed lands, to promote public safety and protect public resources. Decisions regarding specific recreational uses and locations are decided during site-specific management planning.

NON-MOTORIZED USE

Comments:

- I encourage DNR management rules to provide for recreation areas that do not allow motorized vehicles. I like to hike, kayak, and cross country ski and am very disturbed by snow mobiles, ATVs, motorized boats, and motor bikes. Recreation areas with motorized vehicles make the experience just like being in the city and that's not how public lands should be used.
- Leave some areas closed to motorized vehicles (need areas for cross-country skiing/snowshoes).

- Allow cross-country skiing.
- Sled-dogging should be a permitted activity.
- Non-motorized uses should be defined as compatible with trust responsibilities.
- Rules need to address equestrians specifically. Need to address waste from horses, such as manure bins. Rules: visitors take waste with them, or provide receptacles (“leave no trace” education needed).

Response: The multiple use statute (RCW 79.68) establishes public recreational uses as an acceptable use as long as it is compatible with basic activities that fulfill the financial obligations of trust management. Rules are designed to guide behavior of people recreating on DNR-managed lands, to promote public safety and protect public resources. Decisions regarding specific recreational uses and locations are decided in site specific management plans.

P. ISSUES OUTSIDE THE SCOPE OF PROJECT

A variety of comments received fall outside the scope of this project. However, many of these issues would be included in site-specific management plans.

Public comments outside the scope of the Recreation Rule Revision project are listed below:

NOISE

Local noise ordinance enacted

Set noise levels for ORVs and motorcycles in forest should be lower than the state highway levels

Comments

- Concern that in forests where private residences abut DNR boundaries, local noise ordinances can be enacted to set strict quantitative rules for noise level. Consider noise or decibel levels for ORVs in the forest and suggest DNR’s levels be lower than the state highway levels.

SPEED LIMITS

Set statewide maximum speed limits where road conditions do not dictate lower speeds

Post maximum speed limits on DNR paved and unpaved roads

Comments

- A recommendation to determine a statewide maximum speed limit and list maximum speed limits on DNR paved and unpaved roads, in absence of other posted speed limits and where lower speeds are not dictated by road and weather conditions.
- Rules need to address road use by all types of vehicles (i.e. speed limits)
- Roads that are open for vehicle use should also be open for ATVs. Roads closed for standard vehicle use could be available for ATV use unless safety or wildlife needs demand limited or seasonal closures.
- Speed limit signs be put in the parking area of Jones Creek.
- Need speed limits in facilities – posted.
- Need better clarification of speed limits – posted (default max.).

LEVEL OF DIFFCULTY

Request for a variety of difficult trail levels

Have trails with different levels of difficulty and a way for riders to obtain this information

Have trails with different levels of difficulty (ATV, 4x4).

Comments:

- We would also like to see more variety in difficulty levels in trails and some communication channel opened to obtain rider information & opinion when building trails or improving trails so we can help the department make better choices on the construction of trails.

ROAD CLOSURES: ABANDON OR NON-MAINTAINED ROADS

- Concern for the need for vehicular access to all roads.
- Concern no closures to existing roads without an assessment of recreational use.
- Concern no more closure of existing roads without an assessment: of recreational use or if it is used for snowmobiling.
- Request the creation of a process to change designation from road to a trail without having to go through the abandonment process.
- Concern that forest roads closed to street vehicles remain open to ORV.
- Concern that road closure due to RMAP, remain open to motorized and non-motorized access. The majority of the logging roads that are being gated because of RMAPs will make great experiences.

ROAD CLOSURES: MAPS/NOTICES

Comments:

- Need maps in spring of proposed road destruction.
- Need maps for proposed road closures distributed to recreation user groups.
- Notices posted in parking areas/trailheads if there are closures.

SITE SPECIFIC

- Have rules for specific sites or areas, rather than general umbrella rules.
- Refer to policies, etc. in the WAC that have guidance for specific sites.
- Need better evaluation of needs of the site when making improvements – approach decisions from a variety of viewpoints.

LOCAL COMMUNITY PREFERENCE/NEIGHBOR CONCERNS: particular activity in a specific area

Comments:

- Just because it is possible to have 4x4 use at a site, if the local community does not support that use or the community lifestyle is inconsistent, then the local preference must prevail.
- This particular activity draws more abusers than others and if there is not enough planning and thought that go into this type of recreation, the DNR will create more problems on the back end than the front.

- The specific rules for "driving" in recreation areas---"passing," "right of way;" etc---cannot be addressed properly without knowing what areas are being regulated. There may be mitigating circumstances that are not appropriate in every site.
- We are concerned with the apparent direction of the plans for Burnt Hill.

BUILDING NEW TRAILS/AMOUNT OF NEW TRAILS

Create a process for building new trails.

MORE DEVELOPED FACILITIES

- With the increase in outdoor activities, there is a need for additional developed facilities to accommodate the varied user groups.
- Outside of the large units of DNR land the developed recreation facilities can play an important role in urban and unincorporated suburban areas by developing trails.

TRAILS: DESIGNATED

- Some of the changes we would like to see are forest roads that connect bike trails open to off road bikes making loop trail routes available or more trails made that connect already established trails so road riding won't be necessary.
- My main concern in all of this is that we don't lose any of the existing trails throughout the DNR Lands. I'd like to see more trails completed, especially in logical areas where they would become part of a loop – link system, whether within DNR managed areas or tying into trail systems from other agencies.
- Like ideas of separating trail uses, such as Capitol Forest, separating motorized bikes and hikers/horses.

INSURANCE REQUIREMENTS

- Address insurance requirements for organized events.
- More flexibility for insurance requirements (e.g., geographic areas, non-profit groups).
- Insurance requirements determined by type of risk – e.g. type of use, number of participants.
- Liability insurance: address problem of amount of insurance required for organized events.
- Insurance requirements for commercial events versus non-profit events.
- Go back to \$1 million liability insurance requirement; \$1 million is national standard.
- Reduce \$2 million requirement.

SIGNS RELATED TO BEHAVIOR

General Signs

- Signage is very important – tell people what is allowed and not allowed.
- Need signage of ownership and allowed uses.
- Enjoys being in forest without a lot of signs.
- Need better identification of DNR land on the ground.
- Said access must be identifiable and plainly marked for users.

Road Signs

- Clarify and be consistent in marking roads as open/closed and uses at each.
- Inconsistencies on DNR roads – not clear when/if they're open to use (ex. Street licensed/legal or not).
- Better descriptions of what roads are open/closed and when.

Entry Points

- Keep the land open to all users and promote shared use and trail education. Post signs at trailheads and parking lots to educate people about standards, rules and etiquette.
- Signs should be posted at entry points stating no dumping and the fine or penalty to dump trash.
- The various entrances need better signage to permit access and avoid inadvertently inconveniencing adjoining private property owners. One additional advantage is that usage would be spread out and not just near the few well-known entrances.

Response: DNR's Recreation Program manages sign development and implementation. DNR's sign committees include region and division staff. Signs will also be addressed in region recreation management plans. The public is encouraged to contact the local region office with specific concerns.

Trails

- Trails with switchbacks, like Mt. Si, should have signs at the top and bottom of the switchbacks requiring people to stay on the trail, with major fines (\$250 to 1,000) for violators. This will help reduce erosion and maintain the natural beauty of the area.
- Trails should be designated for each use but we oppose the "closed unless posted open" policy. Where this has been attempted, the anti-motorized users removed the "open" signs, effectively closing the trail.
- Post designation for type of use on trails.
- We need some sort of trail sign/rule regarding bikes on trails with horses. Horses can't hear bikes coming. Dangerous, especially bikes going downhill fast.

Response: Rules are designed to guide behavior of people recreating on DNR-managed lands, to promote public safety and protect public resources. Most trail designation decisions are made at the management plan level within each region.

Gates

In areas where there are gates, there should be posted information regarding when such gates are open or closed. Nothing is worse than scouting an area and then discovering there is no vehicle access later on.

Response: DNR's Recreation Program tries to keep updated information regarding closures on the DNR website at <http://www.dnr.wa.gov/base/recreation.html> Contact the nearest region office for specific information related to gates and closures.

Boundary Markers

- Two decades ago, tidelands and forest lands had boundary markers; white plastic posts on tide lands and yellow metal tags on forest lands. Such boundary markers helped ensure

the public did not trespass on private lands. It is suggested such a boundary marking program should be re-implemented and that access roads are also posted properly.

- Maintain section marker posts.

Response: DNR's Recreation Program manages the boundaries through maps; most maps are available via the internet at <http://www.dnr.wa.gov/dataandmaps/maps/index.html>
Contact the nearest region office for specific questions related to boundaries.

Hunting

Post signs or website for non-hunters telling where hunting activities may be located.

Response: Hunting information is located on the Washington Department of Fish and Wildlife's website at <http://wdfw.wa.gov/huntcorn.htm>

POTENTIAL REVENUE

Income Generating Recreation

- This long-term planning is essential to any business plan---and, like it or not, DNR is in a vital, growing recreation business that has as one of its main missions the earning of money. Recreation is an important economic driver that must be taken advantage of, especially in the often hard-pressed, rural areas close to DNR land. But these usage decisions, if they are to be even somewhat rational, cannot be made in a relative rush and directed by everything from current politics to whoever screams the loudest about his ox being gored.
- Planning, based on developed criteria, with active involvement of the public, could even create a large income-generating ATV "park" open to individuals and groups on a reasonable fee basis.
- Increase usage fees. These fees should include all visitors to the DNR lands – hikers, horse riders, etc. Could be in the form of a parking permit similar to what the US Forest Service has done.
- So long as recreation is open to the public for free, there will be few lands set aside specifically for recreation by DNR because they do not satisfy the primary objective of generating income.
- I am recommending that the priorities for all the lands managed by DNR be reconsidered to include a greater consideration for preservation of habitat values for the benefit of future generations, especially devoting more resources to controlling the introduction and spread of non-native species (plants, animals, etc.). In addition, I believe selected lands should be devoted to recreation – one of the great benefits of living in Washington is the accessibility of publicly owned lands for recreation. In order to do this they will have to generate revenue from recreational uses to preserve recreational opportunities and to offset the adverse impacts of such uses.
- There are several categories of recreational use where we expect this would be appropriate. One category is where the recreational activity is incompatible with another revenue generating activity or would be better served if recreation were the primary use. Another category of recreational activity that should be allowed only for a fee is those activities that inherently (or typically) cause additional costs for land management or resource damage.

- An example of an activity which would benefit from managing lands specifically for recreation (which is already done, but under free public access, on WDFW lands) could be managing the vegetation for game birds or deer instead of traditional agriculture (plowed ground, orchards and vineyards or grazing), in which case access would require a fee, comparable to the many privately owned lands which are already leased for hunting.
- An example of an activity which conflicts with revenue generating activities is informal target practice (e.g., shotguns, pistols and rifles) where trees are damaged or trash (such as spent cartridges, broken bottles, television screens, etc.) is left to interfere with use by others, including cattle and wildlife.
- Another recreational activity with the potential to generate additional costs for land management are the various forms of motorized recreation, especially those using ATVs, jeeps and motorcycles. The proponents for that form of recreation, especially the organized groups, claim that is just a few “bad apples” that cause most of the damage, which may be true, but there is also a level of resource damage (e.g., increased sediment supply to streams) resulting from almost any motorized activity. By requiring a license (or other permit) to drive on established roads and tracks which have not been constructed to the standards of a road, it should be possible to pay for the extra work required to prevent or repair damage. We feel that the fee should be at least two tiered, ordinary automobile use and off road vehicle use.
- If recreational users pay fees for recreational opportunities, the funds could be used to offset reductions in typical revenue generating activities to allow better recreational opportunities. For example, people interested in native plants could pay to reduce the number of AMUs allowed on a parcel to reduce the impact of grazing by cattle or sheep on the vegetation in addition to simply outbidding the grazer for the lease. Bird watchers might be willing to pay to modify timber sales (e.g., harvesting fewer trees from a block or leaving more snags) to retain better wildlife habitat. Another possibility would be to lease land to groups to establish trails for off road motorized activities or establish trail networks which may be used for a fee (this would be best done in conjunction with a prohibition of such activities across most of the lands managed by DNR because of their generally detrimental impact).
- The economics of any recreational site proposal must be evaluated-- is it cost effective to implement and administer, does it have any payback, how much will it take from the real purpose of the DNR lands to generate state income, what risks are involved.
- It is quite possible that the ATV, ORV, motorcycle users may well be accommodated in far-larger, more appropriate areas away from current and probable residential and other developments (for example, west of Port Angeles or south of Highway 104 along the Hood Canal, where staging areas could be built right on Highway 101 for plenty of space and easier enforcement). Such planning, based on developed criteria, with active involvement of the public, could even create a large income-generating ATV "park" open to individuals and groups on a reasonable fee basis.
- More funding needs to be found in order to have better and/or more enforcement. Whether the DNR comes up with an annual pass, similar to the Forest Service and Park Service, using the money from citations, or some other means to relieve the financial burden created by illegal dumping, vandalism or theft, something really needs to happen.

- Look at recreation as a potential revenue source.
- Where is the law related to people donating money and time for recreation? How do we apply it on the ground?
- Consider staffing trailheads (e.g., Crown Paper land in Skagit County) or fees, in addition to enforcement (could help pay for enforcement, such as checking for off-road tabs, state issues permits).
- Charge a fee for organized event permits, if group is making money.
- Access fees for parking (like WDFW).

Response: DNR's primary responsibility is to the trust beneficiaries and, in the case of aquatic lands, to the general public. The multiple use statute (RCW 79.68) establishes public recreational uses as an acceptable use as long as it is compatible with basic activities that fulfill the financial obligations of trust management. Income generating recreation opportunities are related to policy, not to rules regarding behavior on public lands, so will not be analyzed in the Draft EIS.

FACILITIES SIZE RELATED TO POPULATION CRITERIA

Currently the amount of trail miles or size of a recreation area is not dependent on the surrounding population or user numbers.

Comments:

- Amount of trails, etc. should be dependent on population or other criteria.
- Upgrade sanitation facilities in line with population increase.

TIMBER SALES AND EXISTING TRAILS/ TRAILS: IMPACTS ON TRAILS

Existing recreation needs protected when timber harvest bids are considered
Trails lost due to logging or other management activities

Comments:

- Existing recreation needs protected when timber harvest bids are being considered. There needs to be communication between the timber contractor/DNR and the user groups involved on specific state lands.
- State laws limiting timber management appeals by recreational users should be recognized and strengthened to lessen the potential impediment of new trail construction on future state timber harvests.
- Trails lost due to logging, road building, or other management activities must be replaced within 6 months of the completion of said activities. Trails should be replaced with equivalent mileage and of the same user category (single track motorcycle, quad, 4x4, etc.).
- Logging companies can help maintain and build roads as part of their agreement to log an area. Local trail users can help to maintain the trails and trailheads that they use.
- Trails lost due to logging, road building, or other management activities must be replaced within 6 months of the completion of said activities. Trails should be replaced with equivalent mileage and of the same user category (single track motorcycle, quad, 4x4, etc.).
- Existing recreation needs protected when timber harvest bids are being considered. The need for communication between the timber contractor/DNR and the user groups involved on specific state land.

- State laws limiting timber management appeals by recreational users should be recognized and strengthened to lessen the potential impediment of new trail construction on future state timber harvests.
- Restore trails after harvest activities if disturbed (put in contracts).
- Coordinate harvest activities with recreational use.
- Leave roads open after timber harvests for certain activities (ex. woodcutting).
- Harvest activities need to protect trails and other sites.
- Communication re: harvest planning and effects on trails.
- Limit public access to active timber operations for safety and protection.

LEASE/EASEMENTS

- Access roads should be grandfathered in, in case sold to private parties in future.
- Need access across private parcels – easements.
- Set standards to optimize access. Use innovative means, create partnerships (ex. Easements, etc.).
- Easements – could restrict users to stay on roads and trails.
- Need public access to landlocked DNR land.
- Allow easements on trails.
- Create flexibility for timber harvests that will easily allow trail easements.
- Create an easier process to obtain trail easements.
- Define thresholds for allowing trail easements.
- Easement agreements that rule out view corridors (need to be viewed as consistent with meeting the trust responsibilities).
- Involve all groups/people in developing leases.
- Are there restrictions to state lands that have grazing permits/leases?

TRASH IN VEHICLES

Concern that vehicles should be cited if they enter state lands with a load of trash in their vehicle.

POLICY

Concern that a statement of policy should assert that new sites/facilities will only be developed where compatible with neighboring land/land uses. (An ORV Sport Park, for instance would not be an appropriate development in close proximity to a school or well-established residential neighborhood.)